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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 JACQUELYNN NICKLER,) Case No. 2:14-cv-01907-JCM-DJA
10 Plaintiff,)
11 vs.)
12 COUNTY OF CLARK, organized and of the)
existing under the laws of State of Nevada;)
13 STEVEN D. GRIERSON, court administrator,)
individually; KATHLEEN LAMBERMONT,)
14 administrator of the Clark County District)
Attorney's office, individually; and, DOE 1)
15 through 10, inclusive;)
16 Defendants.)
17 _____.

18 The parties, by and through their respective counsel, hereby stipulate to extend the
19 time for Plaintiff to reply to the Defendants' oppositions (ECF Nos. 108 and 109) to
20 Plaintiff's motion seeking leave to file a First Amended Complaint. (ECF No. 103) Also
21 Defendants Clark County and Lambermont filed a separate Joinder to Defendant
22 Grierson's Opposition (ECF No. 112). The proposed extension is from the current due
23 date of Thursday, November 14, 2019 through and including Thursday, November 21,
24 2019.

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26 This is the first request for an extension of this deadline. The parties provide the
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1 following information to the Court regarding the proposed extension of time:

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3 1. Plaintiff's counsel has informed Defense counsel that an extension to file

4 the reply is needed because due to the Veterans Day holiday weekend, with

5 a number of longstanding family plans and responsibilities there has been

6 insufficient time for Plaintiff's counsel to respond to the 19 page and 12

7 page Oppositions and the five page Joinder;

8

9 2. Plaintiff's counsel has family in from Florida and Washington for a long

10 planned family get together surrounding Plaintiff's son playing in his Las

11 Vegas Academy band concert at the Smith Center on Wednesday night,

12 November 13, 2019. These family members arrived on Saturday and

13 Tuesday respectively and the last of them do not leave until this coming

14 Saturday.

15

16 3. Additionally, Plaintiff's counsel has had a very heavy workload in this

17 period. On November 12 he had a morning hearing in state court and an

18 afternoon deposition in another cases against Clark County at the office of

19 Mr. Freeman (opposing counsel in this matter for Clark County and

20 Lambermont). Then on Wednesday, November 13 Plaintiff's counsel had

21 a lengthy settlement conference with Magistrate Judge Albregts followed

22 by an administrative Workers' Compensation appeal hearing and then

23 several client meetings. Thursday, November 14 must be devoted to

24 opposing a Summary Judgment Motion, the opposition being due on

25 Monday, November 18, 2019.

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1 This stipulation to extend the deadline is made in good faith and not for purposes of
2 delay.

3 Dated: November 14, 2019

4

5 /s/ James P. Kemp
6 James P. Kemp, Esq.
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9 Attorney for Plaintiffs

10

11 Dated: November 14, 2019

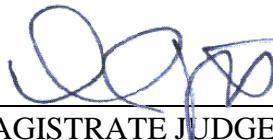
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13 /s/ Robert W. Freedman, Jr.
14 Robert W. Freedman, Jr., Esq.
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18 Kathleen Lambermont

19

20 /s/ D. Randall Gilmer
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24 Attorney for Steven D. Grierson

25 IT IS SO ORDERED:

26 
27 MAGISTRATE JUDGE

28 Dated: November 18, 2019

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